

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-CR-26

YOUSEF O. BARASNEH,

Defendant.

**GOVERNMENT'S UNOPPOSED MOTION FOR ENTRY OF
A PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by Matthew Krueger, United States Attorney for the Eastern District of Wisconsin, and Benjamin Proctor, Assistant United States Attorney for said district, hereby respectfully moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges the defendant with one count of conspiracy against rights in violation of Title 18, United States Code, Section 241.
2. The discovery to be turned over to the defense includes, among other things, statements of the defendants, reports of the investigation, and communication among and between the defendant and others.
3. The discovery materials include potential identifying information regarding subjects in an ongoing investigation and law enforcement employees involved

in such investigation. The investigation has also relied on undercover law enforcement activity. Unnecessary disclosure of such information would be detrimental to an ongoing investigation and would present a serious safety risk to individuals involved. While the government will redact certain information, a discovery protective order is necessary to limit unnecessary disclosures.

4. Counsel for the government has provided a copy of the proposed protective order to the defendant's counsel, who has stated that he no objection to the proposed order governing discovery.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted this 7th day of February, 2020.

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